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HEATHER HOWARD

19 UNITED STATES DISTRICT COURT  
20 NORTHERN DISTRICT OF CALIFORNIA

21 LYNNETTE FRARY, et al.,

22 Case No. CV-12-3928 MEJ

23 Plaintiffs,

v.

24 COUNTY OF MARIN, et al.,

25 **STIPULATED REQUEST TO EXTEND TIME TO  
RESPOND TO FIRST AMENDED COMPLAINT;  
[PROPOSED] ORDER**

26 Defendants.

1       The parties in the above-captioned case, by and through their counsel of record, hereby represent  
2 to the Court as follows:

3       1. On January 17, 2013, Plaintiffs filed their First Amended Complaint in the above-  
4 captioned action.

5       2. Defendants City of Novato, Chief Joseph Kreins, Officer Thomas Mackenzie, Officer  
6 Michael Dunn and Officer Stephanie Commisto's last day to file a responsive pleading to the First  
7 Amended Complaint is currently January 31, 2013.

8       3. Defendants City of Novato, Chief Joseph Kreins, Officer Thomas Mackenzie, Officer  
9 Michael Dunn and Officer Stephanie Commisto intend to file an answer to the First Amended Complaint,  
10 but require additional time to prepare the answer. The parties have agreed to a ten (10) day extension of  
11 time to answer.

12       4. Plaintiffs and Defendants City of Novato, Chief Joseph Kreins, Officer Thomas  
13 Mackenzie, Officer Michael Dunn and Officer Stephanie Commisto stipulate to extend the time for  
14 Defendants City of Novato, Chief Joseph Kreins, Officer Thomas Mackenzie, Officer Michael Dunn and  
15 Officer Stephanie Commisto to respond to the First Amended Complaint through and including  
16 February 11, 2013.

17 Dated: January 31, 2013

BERTRAND, FOX & ELLIOT

18 By: /s/ Richard W. Osman

Richard W. Osman  
Attorneys for Defendants  
CITY OF NOVATO, CHIEF JOSEPH KREINS,  
OFFICER THOMAS MACKENZIE, OFFICER  
MICHAEL DUNN and OFFICER STEPHANIE  
COMMISTO

22 Dated: January 31, 2013

BRENT, FIOL & NOLAN LLP

23 By: /s/ David L. Fiol

David L. Fiol  
Attorneys for Plaintiffs  
LYNNETTE FRARY AND JAMIE BALL

25 Dated: January 31, 2013

BONNER & BONNER

26 By: /s/ Charles A. Bonner

Charles A. Bonner  
Attorneys for Plaintiff  
HEATHER HOWARD

1                   **PROPOSED ORDER**  
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3       Upon the foregoing Stipulation, and for good cause shown, IT IS ORDERED that the time for  
4 Defendants City of Novato, Chief Joseph Kreins, Officer Thomas Mackenzie, Officer Michael Dunn and  
Officer Stephanie Commisto to respond to the Complaint shall be extended to February 11, 2013.

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6       DATED: January 31, 2013  
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